

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT
GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION;
ASHLAND CHEMICAL COMPANY;
BOARHEAD CORPORATION;
CARPENTER TECHNOLOGY
CORPORATION; CROWN METRO;
INC.; DIAZ CHEMICAL
CORPORATION; EMHART
INDUSTRIES, INC.; ETCHED
CIRCUITS, INC.; fcg, INC.; GLOBE
DISPOSAL CO., INC.; GLOBE-
WASTECH, INC.; HANDY & HARMAN
TUBE COMPANY, INC.; KNOLL, INC.;
MERIT METAL PRODUCTS
CORPORATION; NOVARTIS
CORPORATION; NRM INVESTMENT
COMPANY; PLYMOUTH TUBE
COMPANY; QUIKLINE DESIGN AND
MANUFACTURING CO.; RAHNS
SPECIALTY METALS, INC.; ROHM
AND HAAS COMPANY; SIMON
WRECKING CO., INC.; TECHALLOY
CO., INC.; THOMAS & BETTS
CORPORATION; UNISYS
CORPORATION; UNITED STATES OF
AMERICA DEPARTMENT OF NAVY,

Defendants.

Case No. 02-3830
Judge LeGrome Davis

MOTION FOR ADMISSION *PRO HAC VICE* OF
JOHN SIMON, THOMAS SABINO AND DIANA BUONGIORNO

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Defendant, Advanced Environmental Technology Corporation, hereby moves before the Honorable LeGrome Davis, United States District Court for the Eastern District of Pennsylvania pursuant to Local Rules 83.5.2(b), for the pro hac vice admission of John M. Simon, Thomas Sabino and Diana L. Buongiorno, attorneys of the firm of Wolff & Samson, P.A. and in support thereof state as follows:

1. The moving Defendant has retained the services of Wolff & Samson, P.A., Roseland, New Jersey regarding this action.

2. John M. Simon is a Partner in Wolf & Samson, P.A., working on behalf of the moving Defendant concerning the matters at issue in this action.

3. Thomas Sabino is an associate with Wolff & Samson, P.A., working on behalf of the moving Defendant concerning the matters at issue in this action.

4. Diana L. Buongiorno is an associate with Wolff & Samson, P.A., working on behalf of the moving Defendant concerning the matters at issue in this action.

5. Wolff & Samson, P.A. has retained Morris & Adelman, P.C. as local counsel on behalf of the moving Defendant, with the matter to be specifically assigned to the undersigned attorney, Robert M. Morris.

6. I am an active member of the Bar of the Supreme Court of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania, having been admitted in 1971, with a Bar Number of 02604.

7. John M. Simon is an attorney duly admitted and qualified to practice in all Court and Agencies in the State of New Jersey as well as the United States District Court for the District of New Jersey, the Southern District of New York and Northern

District of New York, but is not admitted to the Bar of this Court. See Affidavit of John M. Simon submitted herewith.

8. Thomas Sabino is an attorney duly admitted and qualified to practice in all Courts and Agencies in the State of New Jersey as well as the United States District Court for the District of New Jersey, but is not admitted to the Bar of this Court. See Affidavit of Thomas Sabino submitted herewith.

9. Diana L. Buongiorno is an attorney duly admitted and qualified to practice in all Courts and Agencies in the State of New Jersey as well as the United States District Court for the District of New Jersey, but is not admitted to the Bar of this Court. See Affidavit of Diana L. Buongiorno submitted herewith.

10. I believe it is in the moving Defendants best interest that John M. Simon, Thomas Sabino and Diana L. Buongiorno be admitted, as they are familiar with the laws and facts applicable to the instant environmental action.

11. John M. Simon is a member in good standing of the Bars to which he is admitted and has no pending disciplinary actions against him or prior disciplinary history. See Affidavit of John M. Simon submitted herewith.

12. Thomas Sabino is a member in good standing of the Bars to which he is admitted and has no pending disciplinary actions against him or prior disciplinary history. See Affidavit of Thomas Sabino submitted herewith.

13. Diana L. Buongiorno is a member in good standing of the Bars to which she is admitted and has no pending disciplinary actions against her or prior disciplinary history. See Affidavit of Diana L. Buongiorno submitted herewith.

14. John M. Simon has represented that he will abide by the rules and judicial determinations of this Court. See Affidavit of John M. Simon submitted herewith.

15. Thomas Sabino has represented that he will abide by the rules and judicial determinations of this Court. See Affidavit of Thomas Sabino submitted herewith.

16. Diana L. Buongiorno has represented that she will abide by the rules and judicial determinations of this Court. See Affidavit of Diana L. Buongiorno submitted herewith.

17. Pursuant to Local Rule 83.5.2(a), I will serve as associate counsel of record upon whom all pleadings, motions, notices and other papers can be served.

WHEREFORE, Defendant, Advanced Environmental Technology Corporation, respectfully request the admission pro hac vice of John M. Simon, Thomas Sabino and Diana L. Buongiorno.

Respectfully Submitted,

MORRIS & ADELMAN, P.C.

/s/
ROBERT M. MORRIS
I.D. No. 67896
1920 Chestnut Street, Suite 300
P.O. Box 30477
Philadelphia, PA 19103-8477
Tel. No. 215-568-5621
Email: mail@morrisadelman.com
Attorneys for Defendant,
Advanced Environmental
Technology Corporation

Dated: September 25, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT :
GROUP, :

Plaintiff, :

v. :

ADVANCED ENVIRONMENTAL :
TECHNOLOGY CORPORATION; :
ASHLAND CHEMICAL COMPANY; :
BOARHEAD CORPORATION; :
CARPENTER TECHNOLOGY :
CORPORATION; CROWN METRO; :
INC.; DIAZ CHEMICAL :
CORPORATION; EMHART :
INDUSTRIES, INC.; ETCHED :
CIRCUITS, INC.; fcg, INC.; GLOBE :
DISPOSAL CO., INC.; GLOBE- :
WASTECH, INC.; HANDY & HARMAN :
TUBE COMPANY, INC.; KNOLL, INC.; :
MERIT METAL PRODUCTS :
CORPORATION; NOVARTIS :
CORPORATION; NRM INVESTMENT :
COMPANY; PLYMOUTH TUBE :
COMPANY; QUIKLINE DESIGN AND :
MANUFACTURING CO.; RAHNS :
SPECIALTY METALS, INC.; ROHM :
AND HAAS COMPANY; SIMON :
WRECKING CO., INC.; TECHALLOY :
CO., INC.; THOMAS & BETTS :
CORPORATION; UNISYS :
CORPORATION; UNITED STATES OF :
AMERICA DEPARTMENT OF NAVY, :

Defendants. :

Case No. 02-3830
Judge LeGrome Davis

AFFIDAVIT OF JOHN M. SIMON IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE*

STATE OF NEW JERSEY :
: **SS.**
COUNTY OF ESSEX :

JOHN M. SIMON, being duly sworn, deposes and says:

1. I, John M. Simon, am a partner of Wolff & Samson, P.A., Roseland, New Jersey, attorneys for Defendant, Advanced Environmental Technology Corporation ("AETC"). I submit this affidavit in support of the motion for admission to practice pro hac vice in the above captioned matter.

2. My residence address is 25 Schindler Terrace, West Orange, New Jersey 07052.

3. My office address is 5 Becker Farm Road, Roseland, New Jersey 07068.

4. I am a member in good standing of the United States District Court for the District of New Jersey, the Southern District of New York and the Northern District of New York in addition to the Bar of the State of New Jersey, having been admitted in 1985.

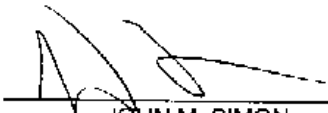
5. There have never been and currently are no pending disciplinary proceedings against me in any state or federal court.

6. I believe it is in the best interest of AETC, that I be admitted pro hac vice in this action because of my familiarity with the matters at issue, because I have previous experience in environmental litigation and have previously represented AETC in Superfund litigation.

7. I will abide by the rules and judicial determinations of this Court.


8. I agree, pursuant to Local Rule 83.5.2(a), that Robert M. Morris will serve as associate counsel of record upon whom all pleadings, motions, notices and other papers can be served.

Wherefore, it is respectfully requested that the Court grant the moving Defendant's motion and allow me to appear as counsel and advocate pro hac vice for Defendant, AETC.



JOHN M. SIMON

Sworn to and subscribed
before me this 20th day of
September, 2002



NOTARY PUBLIC
LISA DIMMICK
A Notary Public Of New Jersey
My Commission Expires March 8, 2007

794630.01

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT
GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION;
ASHLAND CHEMICAL COMPANY;
BOARHEAD CORPORATION;
CARPENTER TECHNOLOGY
CORPORATION; CROWN METRO;
INC.; DIAZ CHEMICAL
CORPORATION; EMHART
INDUSTRIES, INC.; ETCHED
CIRCUITS, INC.; fcg, INC.; GLOBE
DISPOSAL CO., INC.; GLOBE-
WASTECH, INC.; HANDY & HARMAN
TUBE COMPANY, INC.; KNOLL, INC.;
MERIT METAL PRODUCTS
CORPORATION; NOVARTIS
CORPORATION; NRM INVESTMENT
COMPANY; PLYMOUTH TUBE
COMPANY; QUIKLINE DESIGN AND
MANUFACTURING CO.; RAHNS
SPECIALTY METALS, INC.; ROHM
AND HAAS COMPANY; SIMON
WRECKING CO., INC.; TECHALLOY
CO., INC.; THOMAS & BETTS
CORPORATION; UNISYS
CORPORATION; UNITED STATES OF
AMERICA DEPARTMENT OF NAVY,

Defendants.

Case No. 02-3830
Judge LeGrome Davis

AFFIDAVIT OF THOMAS SABINO IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

STATE OF NEW JERSEY :

:SS.

COUNTY OF ESSEX :

THOMAS SABINO, being duly sworn, deposes and says:

1. I am a senior attorney with Wolff & Samson, P.A., Roseland, New Jersey, attorneys for Defendant, Advanced Environmental Technology Corporation ("AETC"). I submit this affidavit in support of the motion for admission to practice pro hac vice in the above captioned matter.

2. My residence address is 92 South Mountain Avenue, Cedar Grove, New Jersey 07009.

3. My office address is 5 Becker Farm Road, Roseland, New Jersey 07068.

4. I am a member in good standing of the United States District Court for the District of New Jersey, and the Bar of the State of New Jersey, having been admitted in 1990.

5. There have never been and currently are no pending disciplinary proceedings against me in any state or federal court.

6. I believe it is in the best interest of AETC, that I be admitted pro hac vice in this action because of my familiarity with the matters at issue, because I have previous experience in environmental litigation and have previously represented AETC in Superfund litigation.

7. I will abide by the rules and judicial determinations of this Court.

8. I agree, pursuant to Local Rule 83.5.2(a), that Robert M. Morris will serve as associate counsel of record upon whom all pleadings, motions, notices and other papers can be served.

Wherefore, it is respectfully requested that the Court grant the moving Defendant's motion and allow me to appear as counsel and advocate pro hac vice for Defendant, AETC.


THOMAS SABINO

Sworn to and Subscribed
before me this 20th day of
September, 2002


NOTARY PUBLIC
JANET A. SCHULTZ
A Notary Public of New Jersey
My Commission Expires 12/29/04

794636.01

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT
GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION;
ASHLAND CHEMICAL COMPANY;
BOARHEAD CORPORATION;
CARPENTER TECHNOLOGY
CORPORATION; CROWN METRO;
INC.; DIAZ CHEMICAL
CORPORATION; EMHART
INDUSTRIES, INC.; ETCHED
CIRCUITS, INC.; fcg, INC.; GLOBE
DISPOSAL CO., INC.; GLOBE-
WASTECH, INC.; HANDY & HARMAN
TUBE COMPANY, INC.; KNOLL, INC.;
MERIT METAL PRODUCTS
CORPORATION; NOVARTIS
CORPORATION; NRM INVESTMENT
COMPANY; PLYMOUTH TUBE
COMPANY; QUIKLINE DESIGN AND
MANUFACTURING CO.; RAHNS
SPECIALTY METALS, INC.; ROHM
AND HAAS COMPANY; SIMON
WRECKING CO., INC.; TECHALLOY
CO., INC.; THOMAS & BETTS
CORPORATION; UNISYS
CORPORATION; UNITED STATES OF
AMERICA DEPARTMENT OF NAVY,

Defendants.

Case No. 02-3830
Judge LeGrome Davis

AFFIDAVIT OF DIANA L. BUONGIORNO IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

STATE OF NEW JERSEY :

: SS.

COUNTY OF ESSEX :

DIANA L. BUONGIORNO, being duly sworn, deposes and says:

1. I, Diana L. Buongiorno, am an associate of Wolff & Samson, P.A., Roseland, New Jersey, attorneys for Defendant, Advanced Environmental Technology Corporation ("AETC"). I submit this affidavit in support of the motion for admission to practice pro hac vice in the above captioned matter.

2. My residence address is 101 Pines Lake Drive East, Wayne, New Jersey 07470.

3. My office address is 5 Becker Farm Road, Roseland, New Jersey 07068.

4. I am a member in good standing of the United States District Court for the District of New Jersey, and the Bar of the State of New Jersey, having been admitted in 1999.

5. There have never been and currently are no pending disciplinary proceedings against me in any state or federal court.

6. I believe it is in the best interest of AETC, that I be admitted pro hac vice in this action because of my familiarity with the matters at issue, because I have previous experience in environmental litigation and have previously represented AETC in Superfund litigation.

7. I will abide by the rules and judicial determinations of this Court.

8. I agree, pursuant to Local Rule 83.5.2(a), that Robert M. Morris will serve as associate counsel of record upon whom all pleadings, motions, notices and other papers can be served.

Wherefore, it is respectfully requested that the Court grant the moving Defendant's motion and allow me to appear as counsel and advocate pro hac vice for Defendant, AETC.


DIANA L. BUONGIORNO

Sworn to and Subscribed
before me this 20th day of
September, 2002


NOTARY PUBLIC
LISA DUNKERLEY
A Notary Public Of New Jersey
My Commission Expires March 8, 2007

794637.01

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2002, I caused a copy of the within Motion, supporting Affidavits of John M. Simon, Thomas Sabino and Diana L. Buongiorno and the proposed form of Order to be served upon all Counsel of Record via first class mail.

MORRIS & ADELMAN, P.C.

/s/

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Attorneys for Defendant,
Advanced Environmental
Technology Corporation